



Housing White Paper: Fixing our Broken Housing Market

Consultation Response from Mobile UK

May 2017

About Mobile UK

1. Mobile UK is the trade association for the UK's Mobile Network Operators (MNO) - EE, Telefonica UK (O2), Three and Vodafone. Our goal is to realise the power of mobile to improve the lives of our customers and the prosperity of the UK as a whole.
2. As mobile increasingly becomes the device of choice for running daily life both at home and at work, customers want improved coverage and greater capacity. Mobile UK's role is to identify the barriers to progress, and work with all relevant parties to bring about change, be they Government, regulators, industry, consumers or citizens more generally.

Introduction

3. Mobile UK welcomes the opportunity to respond to the Government's consultation on changes to planning policy and legislation in relation to planning for housing, sustainable development and the environment.
4. MNOs are committed to meeting the rising demand from customers for more capacity and coverage across the UK. It is also important to remember that meeting such demand is dependent on many factors, beyond national government, to ensure that the environment for mobile operators is flexible enough to evolve with new technologies and allows rapid deployment of critical infrastructure. In particular, there needs to be greater support from local authorities and major land owning organisations in the siting of new infrastructure.
5. Mobile UK stands ready to assist the Government further to expand on points made in this submission.

Consultation on the Housing White Paper

6. Mobile UK welcomes the Government's decision to look into reform of the housing market and in particular to support improved broadband and mobile coverage.
7. Mobile UK strongly supports the Government's proposals as set out in this White Paper to require local authorities to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers.
8. Mobile connectivity is part of the nation's critical infrastructure and must be hard-wired into national and local planning policy. Too often the installation of mobile infrastructure is considered post development. Active national and local Government support is essential and should include the development of coordinated plans for the deployment of mobile networks, drawn up in

partnership with local authorities, MNOs and in collaboration with other bodies such as Local Enterprise Partnerships.

9. Mobile UK stands ready to assist further to expand on points made in this submission.

Mobile UK Consultation Response

10. Question 19 - Do you agree with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers?

11. Mobile UK strongly agrees with the proposal to amend national policy so that local planning authorities are expected to have planning policies setting out how high quality digital infrastructure will be delivered in their area, and accessible from a range of providers.

12. Mobile communications networks are national in nature yet many key inputs are determined and made at a local level. It is important that this White Paper ensures that decisions pertaining to nationally significant infrastructure are taken at the appropriate level. Local authorities must also be able to work within an effective framework of policy established nationally.

13. Planning policies must support economic growth in order to create jobs and prosperity. High quality communications infrastructure is essential for sustainable economic growth.

14. Local Development Plans require stringent deadlines for adoption to take into account up-to-date national policy and guidance. Current plans are not being implemented within acceptable timeframes creating unnecessary uncertainty.

15. New developments must consider mobile infrastructure at the early stage of planning, preferably as part of a planning application. Too often the first notice a mobile network operator will receive regarding a new development will be a 'Notice to Quit' (NTQ) which calls on mobile network operators to remove existing infrastructure. Alternative sites are often difficult to find or fail to provide coverage to the original footprint. Even if a suitable site is found it will often result in a break in service as necessary planning permission is sought. In addition, the knock-on effect to other nearby sites can result in cuts to capacity due to the removal of essential network infrastructure or increased traffic to cover the lost equipment.

16. Planning policies must also take into account the types of infrastructure required to ensure high quality communications infrastructure can be rolled out effectively. It is therefore important that national planning policy provides guidance to ensure that one piece of infrastructure equipment cannot be accepted under one category (i.e small cells under de minimis planning classification) in one area but rejected in another.

17. This review must also take into account future changes in technology and ensure that the proposals remain flexible enough to keep pace with the rapid evolution of mobile communications markets (e.g. the growing use of small cells).

18. Question 20 – Do you agree with the proposals to amend national policy so that:

a. The status of endorsed recommendations of the National Infrastructure Commission is made clear?

19. Mobile UK agrees with the Government's proposals to amend national policy so that the status of endorsed recommendations of the National Infrastructure Commission are made clear.